

EXHIBIT E

From: [David Simons](#)
To: [Stameshkin, Liz](#); [Lauter, Judd](#); [Dunning, Angela L.](#); [Kathleen Hartnett](#); mlemley@lex-lumina.com; [Ghajar, Bobby A.](#); [Ghazarian, Colette A](#)
Cc: [Jesse Panuccio](#); [Poppell, Cole A](#); [Biksa, Liene](#); [Weinstein, Mark](#); [Alvarez, Jessica](#); [Holden Benon](#); [Christopher Young](#); [Aaron Cera](#); [Cadio Zirpoli](#); [Joe Saveri](#); [Margaux Poueymirou](#); [Ashleigh Jensen](#); [Rya Fishman](#); [Matthew Butterick](#); [Nada Djordjevic](#); [James Ulwick](#); [Bryan L. Clohes](#); [Mohammed Rathur](#); [Amy Keller](#); [David Straite](#); [Ruby Ponce](#); [Alexander Sweatman](#); [Heaven Haile](#); [Llama BSF](#); [Josh Schiller](#); [David Boies](#); [Maxwell Pritt](#); [z/Meta-Kadrey](#)
Subject: Re: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines
Date: Friday, October 11, 2024 1:51:42 PM

Counsel,

Given the short time remaining before the Jewish holiday begins on the East Coast, Plaintiffs have quickly developed a compromise proposal that largely splits the difference on expert dates and summary judgment/Daubert, and also seeks agreement to codify a limited subset of additional deadlines that will facilitate discovery moving forward expeditiously. Please let us know whether this proposal is acceptable. Should Meta disagree, Plaintiffs reserve all rights to propose other discovery deadlines. Thanks.

Best,
David

Case Event	Plaintiffs' Proposed Deadline	Defendant's Proposal	Compromise Proposal
Serve Additional Written Discovery Requests	Fri Oct 11, 2024	October 18, 2024	October 18, 2024
Identification of Addt'l Document Custodians/Deponents	Fri Oct 11, 2024	N/A	
Letter Briefs re: Addt'l Custodians/Deponents	Fri Oct 11, 2024	Letter Brief re: Add'l Deposition(s) – Fri Oct 11, 2024 Letter Brief re: Add'l Custodians – after meet and confer is complete, pursuant to ESI Order protocols.	N/A given that the briefing on depositions is going in today.
Meet/Confer re: Existing Written Discovery	Mon Oct 14, 2024	N/A	Wednesday, October 16 (per the parties earlier agreement over email)
Exchange updated Privilege Logs	Wed Oct. 16, 2024	N/A	
Meet & Confer re: Updated Privilege Logs	Wed Oct. 23, 2024	N/A	
Exchange Supplemental Initial Disclosures	Wed Oct 16, 2024	N/A	Wednesday, October 16
Motion for Leave to Amend Complaint	Fri Oct 18, 2024	N/A	
Letter Briefs re: Existing Written Discovery	Fri Oct 18, 2024	N/A	Wednesday, October 23
Responses To Addt'l Discovery (served by 10/11)	Mon Nov 4, 2024	N/A (Federal Rules Apply)	
Documents/Priv. Logs for Addt'l Discovery (served by 10/11)	Thu Nov 7, 2024	N/A (Federal Rules Apply)	
Meet/Confer re: Responses to Addt'l Discovery (served by 10/11)	Wed Nov 13, 2024	N/A	
Letter Briefs re: Addt'l	Fri Nov 15, 2024	N/A (Local Rules Apply)	

Discovery (served by 10/11)			
Close of Fact Discovery	December 13, 2024	December 13, 2024	December 13, 2024
Expert Reports			
Opening Expert Reports Due	Fri Jan 10, 2025	January 10, 2025	Same
Rebuttal Expert Reports Due	Wed Feb 5, 2025	January 31, 2025	Feb. 3, 2025
Close of Expert Discovery	Wed Feb 26, 2025	February 21, 2025	Feb. 26, 2025
Summary Judgment and Daubert Motions			
Opening MSJ/Daubert Briefs Due	Wed Mar 12, 2025	February 28, 2025	March 7, 2025
Opposition to MSJ/Daubert Briefs Due	Wed Apr 9, 2025	March 28, 2025	April 4, 2025
Reply MSJ/Daubert Briefs Due	Wed Apr 23, 2025	April 17, 2025	April 18, 2025
Motion for Summary Judgment Hearing	Thu May 1, 2025	May 1, 2025	Same

From: Stameshkin, Liz <lstameshkin@cooley.com>

Sent: Friday, October 11, 2024 2:59 PM

To: David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

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Counsel,

Below are our proposed dates. If you are agreeable to our proposal (which includes removing the dates that we do not think are necessary for this schedule), we can get this on file. If we have disputes, we would suggest both sides have a short (half page) position statement as to our proposed schedule.

Case Event	Plaintiffs' Proposed Deadline	Defendant's Proposal
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Letter Briefs re: Addt'l Discovery (served by 10/11)	Fri Nov 15, 2024	N/A (Local Rules Apply)
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Reply MSJ/Daubert Briefs Due	Wed Apr 23, 2025	April 17, 2025
Motion for Summary Judgment Hearing	Thu May 1, 2025	May 1, 2025

From: David Simons <dsimons@BSFLLP.com>

Sent: Friday, October 11, 2024 8:29 AM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JISchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

[External]

Counsel, following up on the below from yesterday. I do not believe we have received a response. Please let us know if we can stipulate to these deadlines. FYI, certain members of our team (including me) will be observing the Jewish holiday starting in a few hours on the East Coast so we would appreciate reaching resolution promptly. Thanks.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Thursday, October 10, 2024 2:57 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgs.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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Subject: Re: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

Counsel,

Per the Court's Order, below are Plaintiffs' proposed deadlines for the remainder of discovery. Please advise if Defendant is willing to stipulate to these deadlines or otherwise let us know Defendant's position so we can meet and confer as necessary. Thanks.

Case Event	Proposed Deadline
Additional Written Discovery Requests	Fri Oct 11, 2024
Identification of Addt'l Document	

Custodians/Deponents	Fri Oct 11, 2024
Letter Briefs re: Addt'l Custodians/Deponents	Fri Oct 11, 2024
Meet/Confer re: Existing Written Discovery	Mon Oct 14, 2024
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Opposition to MSJ/Daubert Briefs Due	Wed Apr 9, 2025
Reply MSJ/Daubert Briefs Due	Wed Apr 23, 2025
Motion for Summary Judgment Hearing	Thu May 1, 2025

From: David Simons <dsimons@BSFLLP.com>

Sent: Thursday, October 10, 2024 2:16 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe

Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Kadrey v. Meta - Plaintiffs' Third Set of Interrogatories

Counsel,

Please see attached. As per the letter Plaintiffs sent on October 9, please advise us promptly if you will consent to an increase in the number of interrogatories, otherwise we will raise that issue with Judge Hixson. We are available to meet and confer at your earliest convenience.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Wednesday, October 9, 2024 6:46 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Plaintiffs' Fifth Set of RFPs

Counsel,

Please see attached. If you have any questions or objections, please let us know promptly so we can meet and confer at your earliest convenience.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Wednesday, October 9, 2024 6:34 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett

<khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A.

<bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Plaintiffs' First Set of RFAs

Counsel,

Please see attached. If you have any questions or objections, please let us know promptly so we can meet and confer at your earliest convenience.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Tuesday, October 8, 2024 8:14 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Kadrey v. Meta - Amended Notice of 30(b)(6) Deposition:

Counsel,

Please find attached an amended notice of a 30(b)(6) deposition for Meta Platforms, Inc. We are happy to discuss scheduling at your earliest convenience given Judge Hixson's order regarding the amount of time Plaintiffs will have, which will necessitate multiple deposition days. If you anticipate lodging any objections to the amended notice, please let us know promptly so we can begin the meet and confer process. Thanks.

Best,
David

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